

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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IN RE:	:	
Sara M. Keenan	:	Chapter 13
Debtor.	:	Case No.: 20-14061-AMC
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**MOTION TO SELL REAL PROPERTY FREE  
AND CLEAR OF LIENS AND ENCUMBRANCES**

Sara M. Keenan (the “Debtor”), by and through their undersigned counsel, hereby move this Honorable Court to Sell their Real Property under Eastern District of Pennsylvania Local Rule 6004-1 and Section 363 of the United States Bankruptcy Code and in support thereof aver the following:

1. The Debtor filed the Chapter 13 Bankruptcy Petition on October 13, 2020.
2. The subject real property is located at 8716 Macon Street, Philadelphia, PA 19152 (the “Property”).
3. The Debtor now holds a 100% interest in the Property acquired through a marital settlement.
4. The Debtor believes it to be in their best financial interest to sell the property.
5. In furtherance of the sale, the Debtor retained the services of Joseph Gauglione of HomeSmart ealty Advisors.
6. On or about April 21, 2023, Debtors by and through their realtor, entered into an Agreement of Sale of the property in the amount of \$225,000.00. A true and correct copy of the Agreement of Sale is attached hereto and labeled as **Exhibit “A.”**
7. The settlement date for the sale of the subject property is scheduled for June 21, 2023.

8. The buyer, Anchor of Hope Investments, LLC, is not an insider of the Debtor and the sale represents an arms-length transaction between the parties, made without fraud and/or collusion.

9. U.S. Bank, National Association, holds a mortgage in the approximate amount of \$98,000.00.

10. The Debtor is desirous of receiving the total exemption in the sum of \$25,150.00 from their portion of the sale proceeds plus any sums remaining after all claims are satisfied.

11. The remaining proceeds after the Debtor's exemption shall be paid to and distributed by the chapter 13 trustee.

**WHEREFORE**, Debtors, by and through the undersigned counsel, respectfully request this Honorable Court to enter an Order: (i) Granting this Motion, (ii) Authorizing the Debtor to sell the Property to the proposed buyer under the terms of that Agreement for the Sale of Real Estate free and clear of liens, claims interests and encumbrances, and, (iii) Granting the Debtor such other and further relief to which they may be justly entitled.

Dated: April 26, 2023

/s/Brad J. Sadek  
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